REMARKS

Status of Claims

Claims 1–16 and 28–29 are pending in this application. Claims 1, 7, and 28 have been amended. No new matter has been added. Reconsideration of the application is respectfully requested in view of the above amendments and the following remarks.

Rejection under 35 U.S.C. §102(e)

A.) Applicable Authority

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdeggal Brothers v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). *See also*, MPEP § 2131.

B.) Anticipation Rejection Based on U.S. Patent No 6,343,377

Claims 1 and 28 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,343,377 to Gessner *et al.*, (hereinafter "Gessner"). Applicant has amended independent claims 1 and 28 to respectfully traverse the rejection as hereinafter set forth.

Independent claim 1 as amended recites a system comprising a markup language core engine for providing categories of behaviors including layout and rendering behaviors, at least one external component designed to provide categories of external component behaviors including at least one of an external component layout behavior and an external component rendering behavior in addition to the behaviors provided by the core engine. Each external

component is associated with a pair of interfaces that provide communication between the external component and the core engine. The core engine includes a mechanism to extend a selected category of behavior of the core engine with the behaviors of a same category of the at least one external component, such that the behaviors of the same category of the at least one external component participate with the behaviors of the core engine—wherein the mechanism and the at least one external component communicate through the pair of interfaces to confirm participation, and participation includes the at least one external component delegating a portion that is less than all of a processing of the behaviors of the same category to the core engine. The system also includes an output medium to render and layout visual elements as a result of the participation among the markup language core engine and the at least one external component.

Independent claim 28 is amended to recite a computer-readable medium that comprises elements similar to those of independent claim 1.

It is respectfully submitted that the cited prior art, including Gessner, fails to teach, among other things, *(1) participation includes the at least one external component delegating a portion that is less than all of a processing of the behaviors of the same category to the core engine and (2) an output medium to render and layout visual elements as a result of the participation among the markup language core engine and the at least one external component*; as recited in independent claims 1 and 28. The Office relies upon Gessner, at FIG. 2, FIG. 4, and col. 3, ll. 21–col. 4, ll. 13, to anticipate the invention of independent claims 1 and 28. The cited portions of Gessner describe a browser that transfers all control to a replaceable software delegate to provide specified functionality. Gessner expressly indicates that the software delegate is self-contained. Nothing in the cited portions of Gessner discloses a delegate that participates with a markup core engine to provide functionality and a delegate that performs less

than all processing associated with provided functionality. Furthermore, Gessner fails to teach rendering and organizing visual elements based on a result of the participation between a core engine and an external component.

Unlike Gessner, the invention of claims 1 and 28 define a method that extends core functionality via external components that perform less than all processing associated with rendering and organizes visual elements on an output medium based on participation between the core engine and the external component. The invention of claims 1 and 28 share processing of rendering and layout behaviors. Accordingly, for at least the above reasons, the anticipation rejection of claims 1 and 28 should be withdrawn.

Rejection under 35 U.S.C. §103(a)

A.) Applicable Authority

The basic requirements of a *prima facie* case of obviousness are summarized in MPEP §2143 through §2143.03. In order "[t]o establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success [in combining the references]. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)". *See* MPEP §2143. Further, in establishing a *prima facie* case of obviousness, the initial burden is placed on the Examiner. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly

suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references. *Ex parte Clapp*, 227 USPQ 972, 972, (Bd. Pat App. & Inter. 1985)." *Id. See also* MPEP §706.02(j) and §2142.

B.) Obviousness Rejection Based on Gessner in view of U.S. Patent No. 6,161,126

Claims 2–3, 7–10, 12, 13, 15, 16, and 29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gessner in view of U.S. Patent 6,161,126 to Weis et al. (hereinafter "Weis"). For claims 2–3 and 29, the asserted references, whether taken alone or in combination, fail to teach or suggest all the limitations of the rejected claims, Applicant respectfully traverses the rejection as hereinafter set forth. For claims 7–10, 12, 13, 15, and 16, Applicant has amended independent claim 7 to respectfully traverse the rejection.

Claims 2–3 and 29 depend from independent claims 1 and 28. As discussed above, Gessner does not teach all the limitations of amended independent claims 1 and 28. Accordingly, claims 2–3 and 29 are patentable over Gessner for at least the above-cited reasons. The addition of Weis fails to cure the deficiencies of Gessner with respect to the limitations of claims 1 and 28. As such, withdrawal of the 35 U.S.C. § 103(a) rejection of dependent claims 2–3 and 29 is respectfully requested.

Independent claim 7 recites a method performed by a mechanism for extending a behavior of a core engine with a behavior of an external component. Both the core engine behavior and the external component behavior belonging to a same category of behavior, the category being at least one of a layout behavior and a rendering behavior. A behavior initialization method of the external component is called to determine how the behavior of the external component participates with the behavior of the core engine, wherein the core engine

behavior and the external component behavior belong to the same category of behavior and participation includes the at least one external component delegating a portion that is less than all of a processing of the core engine behavior, when the external component behavior to the core engine in a first mode. When the external component is in a second mode, participation among the external component and core engine further includes replacing the core engine behavior with the external component behavior. When the core engine is providing behavior of the core engine, a behavior method of the external component is called to provide the external component behavior; so that the behavior of the external component participates with the behavior of the core engine. Concurrently, the mechanism for the external component receives a call for a behavior method corresponding to the external component behavior, which enables the mechanism to communicate with the core engine during participation of the external component behavior and core engine behavior. In turn, a number of layers are rendered based the participation among the core engine and external component.

It is respectfully submitted that the cited prior art, including Gessner, fails to teach, among other things, *(1) participation includes the at least one external component delegating a portion that is less than all of a processing of the core engine behavior; and (2) presenting a number of layers based on the participation among the external component and the core engine*; as recited in amended independent claim 7. The Office suggests that Gessner in view of Wies renders claim 7 unpatentable. Gessner at FIG. 2, FIG. 4, and col. 3, ll. 21–col. 4, ll. 13, fails to teach or suggest that participation between an external component and a core engine includes delegating a portion that is less than all processing of core engine behavior. The cited portions of Gessner describe a browser that transfers all control to a replaceable software delegate to provide specified functionality. Gessner expressly indicates that the software delegate is self-contained.

Nothing in the cited portions of Gessner discloses a delegate that participates with a core engine to provide functionality and a delegate that performs less than all processing associated with provided functionality. Furthermore, it follows that Gessner fails to teach or suggest rendering a number of layers based on the participation among the external component and the core engine because Gessner fails to teach the participation of claim 7.

Wies fails to remedy the noted deficiencies of Gessner. The Office alleges that Weis col. 23, ll. 35–38 and col. 22, ll. 55–57 teaches or suggests the noted deficiencies. The cited portions of Weis describe a force feedback mouse and corresponding code segments that configure webpages with force feedback capabilities. Nothing in Weis suggests rendering a number of layers based on the participation among the external component and the core engine as recited in claim 7. Accordingly, Wies in combination with Gessner does not teach or suggest all limitations of the invention of claim 7.

Unlike Gessner and Weis, singularly and in combination, the invention of claims 7 recites a method that extends core functionality via external components that perform less than all processing associated with rendering and organizing visual elements. The invention of claim 7 shares processing of rendering and layout behaviors. Accordingly, for at least the above reasons, withdrawal of the 35 U.S.C. § 103(a) rejection of independent claim 7 is respectfully requested.

Dependent claims 8–10, 12–13, and 15–16 further define novel features of the invention of claim 7 and each depend, either directly or indirectly, from independent claim 7. Accordingly, for at least the reasons set forth above with respect to independent claim 7, dependent claims 8–10, 12–13, and 15–16 are believed to be in condition for allowance by virtue of their dependency. See 37 C.F.R. 1.75(c). As such, withdrawal of the 35 U.S.C. § 103(a) rejection of dependent claims 8–10, 12–13, and 15–16 is respectfully requested.

C.) Obviousness Rejection Based on Gessner in view of Weis in further view of U.S. Patent 6,585,777

Claims 4–6, 11, and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gessner in view of Weis, in further view of U.S. Patent No. 6,585,777 to Ramaley et al. (hereinafter "Ramaley"). As the asserted references, whether taken alone or in combination, fail to teach or suggest all the limitations of the rejected claims, Applicant respectfully traverses the rejection as hereinafter set forth.

Claims 4–6, 11, and 14 depend from independent claims 1 and 7. As discussed above, Gessner in view of Wies, singularly and in combination, fails to teach or suggest all the limitations of amended independent claims 1 and 7. Accordingly, claims 4–6, 11, and 14 are patentable over Gessner and Wies for at least the above-cited reasons. The addition of Ramaley fails to cure the deficiencies of Gessner and Wies with respect to the limitations of claims 1 and 7. As such, withdrawal of the 35 U.S.C. § 103(a) rejection of dependent claims 4–6, 11, and 14 is respectfully requested.

CONCLUSION

For at least the reasons stated above, claims 1–16, 28 and 29 are believed to be in condition for allowance, and an early notice thereof is respectfully requested. If any issues remain that would prevent issuance of this application, the Examiner is urged to contact the undersigned by telephone prior to issuing a subsequent action. It is believed that no fee is due in conjunction with the present amendment. However, if this belief is in error, the Commissioner is hereby authorized to charge any amount required to Deposit Account No.19-2112 referencing MFCP 87510.

Respectfully submitted,

/Monplaisir Hamilton/

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